

FEDERAL MARITIME COMMISSION

WASHINGTON, D.C.

DOCKET NO. 15-11

IGOR OVCHINNIKOV, ET AL

v.

MICHAEL HITRINOV ET AL

**RESPONDENTS' MOTION FOR EXTENSION OF TIME DUE TO ILLNESS
AND FOR WAIVER OF TIME FOR FILING MOTIONS**

Pursuant to 46 CFR § 502.102, Specially-Appearing Respondents hereby request for good cause an extension of time in which to file the Motion to Dismiss, Answer, Response to Order to Show Cause, and "Shipping Documents." In particular, Specially-Appearing Respondents request a 10-day extension until May 14, 2016.¹ Specially-Appearing Respondents also request relief based on reasonable grounds from the requirement that this motion be filed seven days before the due date for such documents.

A. EXTENSION

"Good Cause" for the requested extension exists based on the following:

1. Respondent Michael Hitrinov has recently become too ill (including a significant fever) to participate in preparation of the above documents. He will if required submit his medical records to the Presiding Officer *in camera*.
2. In the absence of Mr. Hitrinov, Counsel for Specially-Appearing Respondents cannot finish preparing the documents.

¹ Counsel for Respondent conferred with Counsel for Complainants, and Complainants have declined consent.

3. The timing of the above filings is already before the Presiding Officer, and may well need to be adjusted in any event.

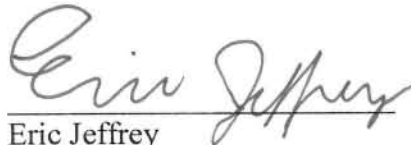
B. TIME WAIVER

Specially-Appearing Respondents request that the usual requirement to file extension requests seven days before the due date be waived. The “reasonable grounds” for this request are that Mr. Hitrinov’s illness is recent, and not known to the undersigned until this past weekend.

CONCLUSION

For the foregoing reasons, Respondents request that the motion for an extension of time and waiver of time requirement be granted.

Respectfully submitted,

A handwritten signature in cursive script, appearing to read "Eric Jeffrey", written over a horizontal line.

Eric Jeffrey

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